

Meeting Minutes Transmittal

300 Area Facility Transition General Topics
Project Managers' Meeting
Federal Building/Room 590-A
Richland, Washington

May 29, 2003
1:00 p.m. - 1:30 p.m.

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EDMC


The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Project Managers' Meeting.


K. D. Bazzell, RL Representative

Date: 9/25/03


F. W. Bond, Washington State Department of Ecology

Date: 9/25/03


D. E. Rasmussen, Contractor Representative, FH

Date: 9/24/03

Meeting Minutes are attached. The minutes are comprised of the following:

Attachment 1 – Agenda

Attachment 2 – Summary of Discussion and Commitments/Agreements

Attachment 3 – Attendance List

Attachment 4 – Letter, D. B. Van Leuven (FH) to K. A. Klein (RL), March 26, 2003,
Completion of 324 Building Portion of Hanford Federal Facility Agreement and Consent
Order Interim Milestone M-92-16

Attachment 5 - Presentations from March 25, 2003, Tri-Party Agreement Quarterly
Milestone Review Meeting

Attachment 6 - LDR Storage Assessment Status

Attachment 7 – 324/327 Buildings LDR Storage Assessment Report

Distribution:

| | | |
|------------------|---------|-------|
| K. D. Bazzell | RL | A3-04 |
| J. M. Bishop | FH | L0-33 |
| F. W. Bond | Ecology | B5-18 |
| R. C. Brunke | FH | N1-26 |
| C. E. Clark | RL | A5-15 |
| D. L. Coleman | FH | L5-66 |
| E. B. Dagan | RL | A5-15 |
| G. P. Davis | Ecology | B5-18 |
| L. A. Dietz | BHI | H0-20 |
| R. H. Engelmann | FH | N1-25 |
| D. T. Evans | RL | A3-04 |
| R. L. Guillen | RL | A6-39 |
| C. R. Haas | FH | L1-04 |
| R. G. Hastings | RL | A5-19 |
| W. A. Hooper | FH | L1-02 |
| D. O. Jenkins | FH | L1-01 |
| R. E. Johnson | FH | N1-25 |
| D. C. Langstaff | RL | A4-70 |
| S. N. Luke | FH | N1-25 |
| A. C. McKarns | RL | A5-15 |
| J. K. Perry | FH | L1-04 |
| R. E. Piippo | FH | A1-14 |
| R. A. Pressentin | RL | A3-04 |
| S. M. Price | FH | H8-67 |
| D. E. Rasmussen | FH | L1-04 |
| D. J. Riffe | FH | L5-66 |
| H. M. Rodriguez | RL | A5-15 |
| J. P. Sands | RL | A3-04 |
| A. E. Teimouri | RL | A2-17 |
| D. W. Templeton | RL | A3-04 |
| T. B. Veneziano | FH | L1-08 |
| J. J. Wallace | Ecology | B5-18 |

Environmental Portal

ADMINISTRATIVE RECORD (two copies): 300 Area Facility Transition General Topics Project Managers' Meeting, (S-3-4); 303-K (S-3-1) [Care of EDMC (H6-08)]

**Washington State Department of Ecology Nuclear and Mixed Waste Hanford Files,
PO Box 47600, Olympia, Washington 98504-7600**

Please send comments on distribution list to D. L. Coleman (L1-06), (509) 376-9170.

Attachment 1

300 Area Facility Transition General Topics Project Managers' Meeting Federal Building, Room 590-A, Richland, Washington

May 29, 2003, 1:00 p.m. – 1:30 p.m.

AGENDA

1. Introduction(s)
2. Previous meeting minutes
3. M-92 Special Case Waste (SCW) status
4. Other topics/discussion
 - a. 327 Building status
 - b. Next Quarterly Milestone Review / IAMIT meeting
 - c. LDR self-assessments status
 - d. 300 WATS
5. Other
6. Action items
7. Schedule next meeting

Attachment 2

300 Area Facility Transition General Topics Project Managers' Meeting Federal Building, Room 590-A, Richland, Washington

May 29, 2003, 1:00 p.m. – 1:30 p.m.

Summary of Discussion and Commitments/Agreements

1. Introduction(s)

Introductions were made (please see attendance list) (Attachment 3).

2. Previous meeting minutes

The January 23, 2003 Project Managers' Meeting (PMM) minutes were approved in March 2003. The March 19, 2003 PMM was canceled.

3. M-92 Special Case Waste (SCW) status

D. Rasmussen (FH) stated that the 324 Building recently finished shipping the SCW, meeting its portion of the M-92-16 milestone. FH has submitted a letter (Attachment 4) to RL documenting the 324 SCW shipments have been completed. The 327 facility is ahead of schedule for shipping SCW since it has been making shipments for the last few years.

D. Rasmussen indicated that FH and RL have discussed the concept of the 340 Facility planning to not remove and ship any additional material at this time for the M-92-16 milestone because the remaining tank heels material is planned to be dispositioned during future facility disposition activities (M-094). A brief discussion ensued regarding the 340 Facility Special Case Waste. D. Evans (RL) requested that FH provide justification information for RL review and transmittal to Ecology regarding plans to address the remaining material as part of planned future activities. D. Rasmussen took the action to interface with the 340 Facility to provide the requested information

4. Other topics/discussion

a. 327 Building status

D. Rasmussen stated that the 327 Building is in minimum safe operation status. R. Bond (Ecology) requested a brief summary of activities remaining in 327. D. Templeton (RL) responded that when the new contractor comes in (contractor transition is on hold pending resolution of a protest regarding the contract award), the decision will be made regarding the most effective approach to perform facility disposition activities and whether to remove the cells as integral, one piece structures. Waste remaining in the 327

Building includes radiologically contaminated equipment in the cells, the ion exchange columns, and seven cans that are stuck in the carousel.

b. Quarterly Milestone Review/IAMIT meeting

The next Tri- Party Agreement Quarterly Milestone Review meeting is scheduled for June 24, 2003. FH is preparing its presentation for the meeting, and will provide Ecology a copy a week in advance of the meeting. R. Piippo stated that all presentations have been requested to be double-sided. D. Rasmussen noted that the March 2003 Quarterly Milestone Review presentation will be attached to today's minutes (Attachment 5).

c. LDR Storage Assessment status

C. Haas (FH) provided a handout (Attachment 6) regarding the Central Plateau facilities LDR storage assessment status. C. Clark (RL) announced that a new policy has been initiated whereby any documentation that is provided to Ecology, either as a status or that has been requested by Ecology, will be accompanied or followed up with a letter to Ecology stating the date, location and information that was transmitted. D. Rasmussen took the action to provide the information to RL on today's LDR handout, and RL will send a letter to Ecology.

R. Bond asked if the 324/327 LDR Storage Assessment Report (Attachment 7) satisfactorily identified the different waste. C. Haas responded that the assessment resulted in some changes to this year's LDR report. T. Miskho (FH) added that the LDR assessment will be presented to Ecology at next month's LDR PMM. If Ecology has any concerns, discussions will continue. Otherwise, the assessment will be accepted as satisfactory.

d. 300 WATS

D. Rasmussen stated that S. Luke (FH) provided the status of 300 WATS during the January 23, 2003 PMM. The facility was PE certified as partially closed over a year ago. A permit modification regarding annual inspections was submitted to Ecology two months ago as a part of Rev 7, Mod E, and is being held up due to Ecology's rescission of Rev 7.

5. Other

C. Clark announced a new RL policy regarding PMM minutes. Signing the PMM minutes will only indicate it is a record of what was discussed, and does not imply commitment by any participant. If a commitment or change in work scope is needed from RL, a letter must be written and signed by Keith Klein, RL manager.

J. Wallace (Ecology) requested a 300 Area site tour, which is intended to include the 324, 327, and 340 Buildings.

6. Action items

There were two new action items: 1) FH will work with the 340 Facility to provide RL with justification information regarding the 340 Facility Special Case Waste; 2) D. Rasmussen will provide RL the information regarding the LDR assessment handout, and RL will transmit a letter to Ecology providing the information.

7. Schedule next meeting

The next meeting was scheduled for July 24, 2003, at 3:00 p.m. in the Federal Building in Richland, WA.

Attachment 3

**300 Area Facility Transition General Topics Project Managers' Meeting
Federal Building, Room 590-A, Richland, Washington**

May 29, 2003, 1:00 p.m. – 1:30 p.m.

Attendance List

300 Area Facility Transition General Topics
 Project Managers' Meeting
 Federal Building/Room 590-A
 Richland, Washington
 May 29, 2003
 1:00 p.m. - 1:30 p.m.

ATTENDANCE LIST

| Name | Company | Phone Number |
|---------------------|--------------------|--------------|
| David E. Rasmussen | FH-CP/300 Area SLM | 376-3288 |
| Clifford E. Clark | DOE-RL | 376-9333 |
| Joanne Wallace | Ecology | 736-3019 |
| Chris Haas | FH-CP | 376-3509 |
| Ken Bazzell | DOE-RL | 373-0462 |
| Tim VENEZIANO | FLOOR HANDLING | 773-4245 |
| DAVE EVANS | DOE-RL | 373-9278 |
| Rick Bond | Ecology | 736-3007 |
| BOB PIERRO | FH TPA | 373-3285 |
| Dave Templeton | DOE-RL FTD | 373-2966 |
| Roger Pressentin | DOE-RL | 376-1291 |
| Hector M. Rodriguez | DOE-RL | |
| | | |
| | | |

Attachment 4

**300 Area Facility Transition General Topics Project Managers' Meeting
Federal Building, Room 590-A, Richland, Washington**

May 29, 2003, 1:00 p.m. – 1:30 p.m.

**Letter, D. B. Van Leuven (FH) to K. A. Klein (RL), March 26, 2003, Completion of 324
Building Portion of Hanford Federal Facility Agreement and Consent Order Interim
Milestone M-92-16**

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author
D. B. Van Leuven
(T. B. Veneziano, 373-4245)
(C. R. Haas, 376-3509)

Addressee
K. A. Klein, RL

Correspondence No.
FH-0301050

CONTRACT NO. DE-AC06-96RL13200
Date Signed: **MAR 26 2003**

Subject: COMPLETION OF 324 BUILDING PORTION OF HANFORD FEDERAL
FACILITY AGREEMENT AND CONSENT ORDER INTERIM MILESTONE
M-92-16

DISTRIBUTION

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| | | President's Office | H5-20 | |
| | | S. W. Bork | B3-70 | |
| <u>OK</u> | <u>3-17-03</u> | L. D. Crass | A1-14 | |
| | | C. R. Haas | L1-04 | |
| | | J. S. Hertz | A1-14 | |
| | | L. J. Hunter | B3-70 | |
| | | J. L. Jacobsen | B3-70 | |
| | | J. R. Kelly | H8-49 | |
| | | R. J. Meyer | B3-70 | |
| | | E. J. Murphy-Fitch | A1-14 | |
| <u>WEP for CJO</u> | <u>3/21/03</u> | L. J. Olguin | L5-65 | |
| <u>JEP</u> | <u>3-13-03</u> | J. K. Perry | L1-04 | |
| <u>REP postilion</u> | <u>3-25-03</u> | R. E. Piippo | A1-14 | |
| <u>URS for</u> | <u>3/25/03</u> | L. L. Powers | B3-53 | |
| <u>DER</u> | <u>3/12/03</u> | D. E. Rasmussen | L1-04 | |
| <u>OK</u> | <u>3-17-03</u> | D. J. Riffe | L5-66 | |
| | | J. R. Robertson | L0-33 | |
| | | E. A. Schultz | B5-53 | |
| <u>URS</u> | <u>3/17/03</u> | D. E. Wertz | L5-66 | |
| <u>AK</u> | <u>3/21/03</u> | T. B. Veneziano | L1-08 | |
| | | R. T. Wilde | E6-35 | |
| | | M. S. Wright | S4-49 | |
| | | OB File/LB | B3-53 | |

Fluor Hanford
P.O. Box 1000
Richland, Washington 99352

FLUOR

MAR 26 2003

FH-0301050
CONTRACT NO. DE-AC06-96RL13200

Mr. K. A. Klein, Manager
U.S. Department of Energy
Richland Operations Office A7-50
Post Office Box 550
Richland, Washington 99352

Dear Mr. Klein:

COMPLETION OF 324 BUILDING PORTION OF HANFORD FEDERAL FACILITY
AGREEMENT AND CONSENT ORDER INTERIM MILESTONE M-92-16

Reference: Letter, N. C. Boyter, FH, to H. E. Bilson, RL, "Contract No.
DE-AC06-96RL13200 – Completion of *Hanford Federal Facility Agreement
and Consent Order* (Tri-Party Agreement) Interim Milestone M-92-15,"
FH-0105402 R1, dated October 25, 2001.

This letter is being submitted to provide formal notification that the 324 Building portion of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) M-92-16 milestone performance standard has been met as described below.

As reported in HNF-5068, Revision 1A, *Project Management Plan (PMP) for the 300 Area Special-Case Waste*, the following delineates the activities required to satisfy the completion of Tri-Party Agreement interim milestone M-92-16:

Milestone M-92-16, Complete removal and transfer and initiate storage of Phase III 300 Area Special Case Waste (SCW) and materials. Phase III inventory will consist of any remaining 300 Area SCW wastes and materials.

**RL COMMITMENT
CONTROL**

MAR 26 2003

**RICHLAND
OPERATIONS OFFICE**

Mr. K. A. Klein
Page 2
MAR 26 2003

FH-0301050
CONTRACT NO. DE-AC06-96RL13200

As stated in the reference, during fiscal year 2001 deactivation activities at the 324 Building, several SCW items identified in Tables 2-1 and 2-2 of HNF-5068, Revision 1A were packaged and shipped to the 200 Area Waste Management Facilities in support of milestone M-92-15. Based on shipping manifests, a total of 93,395 kilocuries (kCi) of SCW were shipped, which was higher than the baseline curie estimate identified in HNF-5068, Revision 1A.

The remaining 324 Building SCW inventory, as shown in Tables 2-1 through 2-2 in HNF-5068, Revision 1A, consisted of approximately 23.7 kCi of D-Cell fuel fragments, pieces, and pins to be removed to complete the 324 Building portion of interim milestone M-92-16. This SCW shipment was completed on November 7, 2002. Based on the shipping manifest, a total of 12.74 kCi of SCW was shipped, which was lower than the baseline curie estimate identified in HNF-5068, Revision 1A. This shipment completed the 324 Building portion of milestone M-92-16.

The remaining 300 Area SCW inventory now remaining is associated with the 327 Building and 340 Complex, and will be addressed in future activities supporting the interim milestone M-92-16.

If you have any additional questions, please contact Mr. T. B. Veneziano on 373-4245; contractual questions should be directed to Ms. L. J. Hunter on 376-6986.

Very truly yours,



David B. Van Leuven
President and
Chief Executive Officer

dc/lar/jj

RL - W. W. Ballard
K. D. Bazzell
H. E. Bilson
C. E. Clark
E. B. Dagan
D. T. Evans
R. G. Hastings

J. B. Hebdon
R. M. Irwin
S. J. Olinger
J. P. Sands
S. A. Sieracki
D. W. Templeton
J. J. Yerxa

Attachment 5

**300 Area Facility Transition General Topics Project Managers' Meeting
Federal Building, Room 590-A, Richland, Washington**

May 29, 2003, 1:00 p.m. – 1:30 p.m.

**Presentations from March 25, 2003, Tri-Party Agreement Quarterly Milestone Review
Meeting**

Nuclear Materials and Facility Stabilization

Milestone TPA-M-92

IAMIT Meeting March 25, 2003
Tri-Party Agreement
Quarterly Milestone Review Report

Ecology Program Manager – FW Bond
DOE-RL Program Manager – DT Evans
FH Environmental Sponsor – DH Vu

Milestone M-92-00 Interim Milestones and Target Dates

| Milestone | Description | Target Date | Status |
|--------------|--|-------------|----------------|
| M-92-00 | Complete acquisition of new facilities, modification of existing facilities, and/or modification of planned facilities necessary for the storage, treatment/processing, and disposal of Hanford Site cesium and strontium capsules (Cs/Sr), bulk sodium (Na) and sodium-potassium alloy (NaK), and 300 Area Special Case Waste (SCW). | TBD | TBD |
| M-92-01 | Complete commercial disposition and/or acquisition of new facilities, modification of existing facilities, and/or modification of planned facilities necessary for sitewide consolidation and storage prior to commercial use or treatment and/or repackaging by DOE-TWRS. | 12/31/09 | On schedule |
| M-92-05 | Inclusion of Hanford Site Cs/Sr "treatment and/or repackaging parameters" in DOE TWRS Phase II Request for Proposals (treatment and/or repackaging of all remaining Cs/Sr). | 6/30/03 | In ORP Review |
| MX-92-06-T01 | Complete commercial disposition and/or acquisition of new facilities, modification of existing facilities, and/or modification of planned facilities necessary for the storage, treatment/processing, and disposal/disposition of all Hanford Site U. Complete the disposal/disposition of ~5 metric tons of UO ₂ source materials located in the 300 Area Fuels Supply Shutdown Facilities and source material located in 325 and 2718-E and complete the disposition of ~235 metric tons of uranium billets located in the 300 Area. | 12/31/01 | Complete |
| MX-92-06-T02 | Complete the disposal/disposition of ~135 metric tons of un-irradiated contaminated fuel located in the 300 Area and 5 metric tons of misc U source material located in all 300 and 200 Area Fuel Supply Shutdown (FSS) Facilities, and complete the disposal/disposition of ~825 metric tons of un-irradiated fuel source materials located in the 300 Area FSS Facilities. | 9/30/06 | On Schedule |
| M-92-09 | Complete acquisition of new facilities, modification of existing facilities, and/or modification of planned facilities necessary for the storage, treatment/processing, and disposal of Hanford Site sodium | In Abeyance | Change Request |
| M-92-10 | Submit Hanford Site Sodium Project Management Plan (PMP) to Ecology pursuant to Agreement Action Plan Section 11.5. | In Abeyance | Change Request |

Milestone M-92-00 Interim Milestones and Target Dates (cont'd)

| Milestone | Description | Target Date | Status |
|--------------|--|-------------|-------------|
| MX-92-11-T01 | Complete disposition options for all Hanford non-radioactive sodium. | 9/30/04 | On schedule |
| M-92-12 | Complete acquisition of new facilities, modification of existing facilities, and/or modification of planned facilities necessary for consolidated storage, prior to disposal of Hanford Site 300 Area SCW and materials. | 9/30/06 | On schedule |
| M-92-13 | Submit 300 Area SCW PMP to Ecology pursuant to Agreement Action Plan, Section 11.5. | 9/30/00 | Complete |
| M-92-14 | Complete removal and transfer, and initiate storage of Phase I 300 Area SCW and materials. Phase I inventory will consist of, at minimum, one-third the total curie content of all 300 Area SCW. | 9/30/02 | Complete |
| M-92-15 | Complete removal and transfer, and initiate storage of Phase II 300 Area SCW and materials. Phase II inventory will consist of, at minimum, half the remaining curie content of 300 Area SCW. | 9/30/04 | Complete |
| M-92-16 | Complete removal and transfer and initiate storage of Phase III 300 Area SCW and materials. | 9/30/06 | On schedule |

Program Manager's Assessment

since last quarterly review

■ **Environmental - Excellent**

- No negative environmental impacts or issues have arisen out of the storage and/or handling, packaging, or transportation of the Special Case Waste (SCW) inventory

■ **Safety - Excellent**

- No negative safety impacts or issues have arisen out of the storage and/or handling, packaging, or transportation of the SCW inventory

■ **Budget - Excellent**

- Key milestone M-92 activities are being completed within budget

Program Manager's Assessment (cont'd)

since last quarterly review

Schedule - Good

MX-92-06-T02

- Awaiting approval of Solid Waste EIS to complete disposition of 825 tons of uranium remaining in 300 Area

M-92-09 and M-92-10

- A draft change request has been submitted to reinstate these milestones with revised due dates

MX-92-11-T01

- A Request for Proposal for removing sodium residues from the two large tanks in 337B was sent to prospective bidders

M-92-16

- The 327 building Special Case Waste (SCW) activities continued ahead of schedule
- The 324 building SCW removal has been completed on schedule

Significant Planned Actions

next three months

■ M-92-09 and M-92-10

- Action on the change request to reinstate these milestones is on hold until the FFTF milestones have been resolved

■ MX-92-06-T02

- If funded, revise existing Safety Analysis Report for Packaging (SARP) to allow on-site shipment of remaining 825 metric tons of fuel assemblies

■ MX-92-11-T01

- Establish contract for cleaning the sodium residuals from 3718M storage tank and 337B Composite Reactor Component Test Activity (CRCTA) vessel. The contract will be for conversion of the residuals to useable caustic; final rinsing and drying of the vessels will be self-performed
- Ship the 337B sodium cold trap to ANL-W for recycle

■ M-92-16

- Ahead of schedule, no activities planned for any packaging and shipment of SCW items at the 327 facility

Project Summary

- M-92-05: To be covered in ORP Milestone Review
- MX-92-06-T02: On schedule
- M-92-09: Negotiating draft change request
- M-92-10: Negotiating draft change request
- MX-92-11-T01: On schedule
- M-92-15: Complete
- M-92-16: On schedule. No further work planned at 327 Building until the new River Corridor Contract is awarded

Attachment 6

**300 Area Facility Transition General Topics Project Managers' Meeting
Federal Building, Room 590-A, Richland, Washington**

May 29, 2003, 1:00 p.m. – 1:30 p.m.

LDR Storage Assessment Status

LDR Storage Assessment Status

- 324 and 327 Buildings LDR Storage Assessments have been completed.
 - Final assessment report is being presented to Ecology in the May 29, 2003 PMM (Attachment 7).
- 300 Area Facilities LDR Storage Assessments will be completed per the attached schedule.
 - The 333 and 314 Buildings LDR Storage Assessment was kicked off March 21, 2003 and is currently in progress.
 - The 3708 Building LDR Storage Assessment will be kicked off this quarter. Assessments for 309 and 3711 will not be performed per agreement with Laura Ruud.
 - The 300 Area General LDR Storage Assessment will be kicked off 3rd quarter CY2003. Scope and ownership are currently being determined.

| DOE-RL LDR Storage Assessment Schedule | | |
|---|--|---|
| DOE LDR Storage Assessment period | Assessment scope/Facility | Responsible contractor |
| 1st quarter CY2002 | 224-T | FH: RL will issue assessment report per June 25, 2002 letter. |
| 2nd quarter CY2002 | 3720 | PNNL |
| 3rd quarter CY2002 | 327 | FH ¹ FH will complete assessment |
| 4th quarter CY2002 | 324 | FH ¹ FH will complete assessment |
| 1st quarter CY2003 | 333 314 | FH ¹ |
| 2nd quarter CY2003 | 3708 309 3711 | FH ¹ |
| 3rd quarter CY2003 | 300 Area General | No clear ownership. FH will perform a cooperative review with other site organizations. |
| 4th quarter CY2003 | 340/340A/340B/300-RLWS | FH ¹ |
| 1st quarter CY2004 | K Basin East | FH |
| 2nd quarter CY2004 | K Basin West | FH |
| | 100 Area Reactor Auxiliaries (excluding reactors) | BHI ¹ |
| 3rd quarter CY2004 | 100 Area General (everything but reactors and reactor auxiliaries) | BHI ¹ |
| 4th quarter CY2004 | SNF Complex | FH |
| 1st quarter CY2005 | 252U 2711E 241-CX | FH |
| 2nd quarter CY2005 | 618-4 ERDF | BHI ¹ |
| 3rd quarter CY2005 | T Plant | FH |
| 4th quarter CY2005 | 200 Area General - 200 Area North - Railcar staging areas | FH |
| 1st quarter CY2006 | 231-Z 241-Z-361 | FH |
| 2nd quarter CY2006 | 6 IMUSTS (200 Area non tank farms not associated with buildings) | FH |
| 3rd quarter CY2006 | 400 Area General - 4734D | FH |
| 4th quarter CY2006 | 224-B | FH |
| 1st quarter CY2007 | 242-B/BL | FH |
| 1 = will be transitioned to new River Corridor Contractor | | |

Attachment 7

**300 Area Facility Transition General Topics Project Managers' Meeting
Federal Building, Room 590-A, Richland, Washington**

May 29, 2003, 1:00 p.m. – 1:30 p.m.

324/327 Buildings LDR Storage Assessment Report

SIGNATURE PAGE

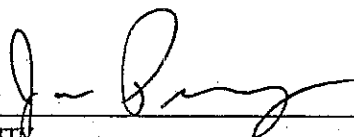
Prepared by:



C. R. Haas
324/327 Buildings Environmental Compliance
Officer

2-24-03

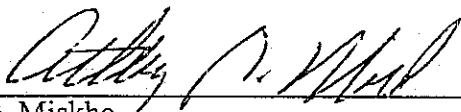
Date



J. K. Perry
Central Plateau Remediation Project
Manager, Environmental Compliance

2-24-03

Date



A. G. Miskho
LDR Report Coordinator
Fluor Hanford, Environment and Regulation

2/26/03

Date

EXECUTIVE SUMMARY

Pursuant to Tri-Party Agreement (TPA) requirements, the Fluor Hanford (FH) Central Plateau Remediation Project Environmental Compliance personnel initiated a line management assessment of the 324 Building and 327 Building on August 27, 2002 to evaluate potential mixed waste (PMW) and mixed waste (MW) matrices. The TPA requirements under milestone M-026-01 refer to this assessment as a Land Disposal Restriction (LDR) storage assessment.

Field assessment activities were conducted during the fourth quarter of CY2002. The scope of the assessment was to validate the status of PMW and MW reported in the CY2001 LDR Report for the 324 and 327 Buildings, identify any other material that should be considered PMW or MW, and when appropriate, to assess the long-term safety posture of PMW against *Resource Conservation Recovery Act* (RCRA) storage criteria/standards.

A meeting was conducted on November 14, 2002, for the assessment of the 327 Building, at the FH offices in the 300 Area. The assessment team, facility points of contact, RL, and subject matter experts attended the meeting. The assessment scope and the areas to be assessed were discussed. A post-assessment meeting was held immediately following the walk through.

The 327 Building assessment resulted in one Finding and one Observation. The Finding concerns the discovery of lead that will be added to the Potential Mixed Waste Table. The Observation concerns the management of material in the Special Environmental Radiometallurgy Facility (SERF) Cell that was previously not expected or forecasted to need mixed waste management. A recent preliminary designation determined the material will be a mixed waste. The CY2001 LDR Report did not report this inventory as a forecasted mixed waste. Since the volume of the mixed waste is very small, there will be no apparent change in the forecasted volume for the 327 Building Location-Specific Data Sheet under MLLW-02 when this mixed waste is added to the existing volume.

A meeting was conducted on November 21, 2002, for the assessment of the 324 Building, at the FH offices in the 300 Area. The assessment team, facility points of contact, and subject matter experts attended the meeting. The assessment scope and the areas to be assessed were discussed. A post-assessment meeting was held immediately following the assessment.

The 324 Building assessment resulted in one Finding and two Observations. The one Finding concerns the identification of reactive matrices in the Shielded Material Facility (SMF) that will be identified as forecasted MW under treatability group MLLW-10. The two observations will lead to (1) deleting the Shielded Glovebox in Room 3G from the Potential Mixed Waste Table and (2) adding forecasted mixed waste inventory for elemental lead to the existing 324 Location-Specific Data Sheet under treatability group MLLW-05.

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1 INTRODUCTION AND SCOPE

A. Background

The 324 and 327 Buildings Deactivation Project scopes include curtailment of the operating missions; stabilization of facility systems, equipment, and residual contamination; removal of highly contaminated equipment; and containerization and removal of the 324/327 Buildings "Special Case Waste" (as defined by *Hanford Federal Facility Agreement and Consent Order* [Tri-Party Agreement] Milestone M-92) and other waste managed under Tri-Party Agreement (TPA) Milestone M-89. The scope also includes the closure of various areas within the 324 Building to meet requirements established in the *324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Areas Closure Plan*, DOE/RL-96-73. Neither building is operating under a RCRA Part A, Form 3 Dangerous Waste Permit Application. However, pursuant to the TPA provisions, the areas covered in the above mentioned closure plan for the 324 Building are being closed. Other portions of the 324 Building and all of the 327 Building are being cleaned up on a schedule to support the overall 300 Area schedule in the TPA.

An amendment to *324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Areas Closure Plan*, DOE/RL-96-73 was developed as required to meet Tri-Party Agreement Milestone M-094-02. This amendment integrates the RCRA closure activities with facility disposition under *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980*.

The negotiations that led to Tri-Party Agreement Milestone M-094-02 and other changes to the Tri-Party Agreement are related directly to a new vision for accelerating cleanup on the Hanford Site. Tri-Party Agreement change number M-094-01 includes a milestone for the complete disposition of the 324 and 327 Buildings by 2010.

B. Assessment

This assessment addresses PMW identification and subsequent handling and storage. The purpose of this assessment is to provide information for DOE's Annual Land Disposal Restrictions (LDR) Report (HFFACO Milestone M-26-01). The scope of the assessment is to validate the status of PMW and MW matrices in the 324 and 327 Buildings and identify any other material that should be considered a PMW or forecasted MW, and assess the long-term safety posture of those items against RCRA storage criteria/standards. In addition, this assessment considered the 324 and 327 Waste Identification Data System sites that were agreed to with Ecology during resolution of the CY2001 LDR Report comments.

This assessment was conducted to evaluate the total picture of how well the 324 Building and the 327 Building meets RCRA storage criteria/standards and LDR reporting requirements. The management assessment entailed selected sampling review of records, facility inspections, and

personnel interviews, tailored to the specific activities being performed at the 324 and 327 Buildings.

2 METHODS

FH began an initial LDR storage assessment at the 324 and 327 Buildings on August 27, 2002. Additional assessment activities were conducted throughout the fourth quarter of CY2002. Assessment meetings were held in the 300 Area on November 14 and 21, 2002. The purpose of the assessment was declared and the scope of the assessment was described. The assessment was conducted using the process of the RL Analysis and Evaluation Division procedure A&E-01, *Evaluation of Contractor Performance in Meeting Waste Management Storage Requirements*, as well as HNF-PRO-246, *Management Assessment*, and CP-PRO-003, *Management Assessment Program*. Based on agreement with Ecology, satellite accumulation areas and 90-day accumulation areas are not part of the LDR storage assessment.

The methods used for these assessments were a combination of document review, interviews, and visual inspection. The areas within the 324 Building and the 327 Building were inspected and regulatory documents were reviewed to develop the areas of primary focus for the assessment. Emphasis was placed on those areas listed as "areas of concern" by the State of Washington Department of Ecology (Ecology) in letters, *327 Building Solid Waste Management Units (SWMUs) Identification in the Waste Information Data System (WIDS)*, dated July 12, 1999, and *324 Building Solid Waste Management Units (SWMUs) Identification in the Waste Information Data System (WIDS)*, dated May 17, 1999. The documents used to develop the checklist (Appendices A and B) for the assessment included the interim status provisions of WAC 173-303 and 40 CFR, as non-requirement criteria for evaluating PMW.

Assessment Team Members

324/327 Facility Team Members:

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DOE Team Member:

Greg Sinton

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3 RESULTS

Appendices A and B, document the comparison of the criteria/standards to the PMW and MW conditions observed, during this assessment. Below are the results of the assessment. The assessment found that additions and deletions for 324 and 327 Building need to be made to the CY2002 LDR Report. The 324 Building Shielded Glovebox can be removed from the CY2002 LDR Report based on the visual inspection and subsequent classification of the contents as 'floor sweepings'. The additions to the CY2002 LDR Report are summarized in the Findings and Observations (Section 4).

3.1 GENERAL

- 1) Waste determinations and treatment standards (WAC 173-303-140, 40 CFR 268): Except for the matrices managed under the 324 Building Closure Plan, information to determine what waste codes would apply to the matrices has not been obtained. Until information is obtained to determine waste codes, an evaluation to determine treatment standard applicability cannot be made. Information will be obtained during the characterization, inventory, and subsequent clean out of the SMF, scheduled for commencement in FY2003.

No issues were found.

- 2) WAP (WAC-173-303-300): A WAP has not been prepared for the 324 or 327 Buildings. Characterization activities will occur during SMF clean out to obtain information about PMW.

No issues were found.

- 3) Facility Security (WAC-173-303-310): Both facilities have posted the correct warning signs on the outside of the buildings and at all entry points.

No issues were found.

- 4) Inspections (WAC-173-303-320): There is no existing inspection schedule for the 324 or 327 Buildings, however routine facility operating procedures are in place to prevent conditions that could lead to a release of mixed waste to the environment.

Documents reviewed:

- HNF-IP-1264, Section 5.2, *Shift Routines and Operating Practices*
- HNF-IP-1264, Section 6.3, *Inspection of Containerized Dangerous Waste*
- 3I-SOP-W-05, *Receipt Inspection of Waste Containers*

No issues were found.

- 5) Personnel Training (WAC-173-303-330): Training records indicated that the training coordinator was assigned, that applicable courses were listed, and personnel requiring

training in their particular areas were current as required. The written training plan had the necessary content, training frequencies, and training techniques. Job descriptions were matched to the training requirements covering requisite skills, education, qualifications, and duties for each position. It was clear that the training was relevant to the positions and the deactivation work being performed in the 324 and 327 Buildings.

Documents reviewed:

- HNF-IP-1285, Revision 5, *River Corridor Project, 324 and 327 Building, Dangerous Waste Training Plan (DWTP)*
- Training qualification card for the 324/327 Environmental Compliance Officer

No issues were found.

- 6) Preparedness, Contingency Plan, and Emergencies (WAC 173-303-340, 350 & 360): Each facility's building emergency plan was established to fulfill the regulatory requirements regarding contingency planning and emergency procedures. The building emergency plans include emergency responses associated with mixed waste. In addition, the building emergency plans will be followed for chemical or radiological releases of waste or materials either during loading, off loading, or accumulation of such waste/materials.

Documents reviewed:

- HNF-IP-0263-324, *Building Emergency Plan for 324 Facility*
- HNF-IP-0263-327, *Building Emergency Plan for 327 Facility*

No issues were found.

- 7) Facility Records (WAC-173-303-380): Operating records are maintained per facility procedures and regulatory requirements. Records associated with waste management and regulatory compliance are maintained in the Regulatory File in MO-275, Room 9.

Documents reviewed:

- *Environmental Regulatory File Checklist*
- HNF-IP-1264, Section 2.20, *Records Management*
- HNF-IP-1264, Section 6.1, *Waste Management Plan*

No issues were found.

- 8) Closure and post closure (Tri-Party Agreement (TPA) Action Plan 5.3, WAC 173-303-610): Closure of the 324 and 327 Buildings will be in conjunction with the Tri-Party Agreement Milestone M-094-03. The M-094-03 milestone requires complete disposition of specified facilities, including the 324 and 327 Buildings by September 30, 2010. Post closure plans for the 324 and 327 Buildings have not yet been issued.

Document reviewed:

- *Hanford Federal Facility Agreement and Consent Order*

No issues were found.

3.2 SPECIFIC

1. Use and management of containers (40 CFR 265, Sub I): The 324 and 327 Building assessments included inspection of areas where matrices were containerized, except for satellite accumulation area and 90—day accumulation areas. Waste matrices in these areas were consistent with those listed in the CY2001 LDR report data sheets for the 324 and 327 Building.

No issues were found.

- 1.1) Condition of containers (265.171): Containers inspected in the 324 and 327 Buildings were in good condition and intact.

No issues were found.

- 1.2) Compatibility of waste with containers (265.172). Waste is packaged per facility operating procedures which precludes the placement of incompatible waste in containers.

No issues were found.

- 1.3) Management of Containers (265.173): The containers inspected at the 324 and 327 Buildings were closed and were not ruptured.

No issues were found.

- 1.4) Inspections (265.174): See general discussion regarding inspections.

- 1.5) Ignitable, reactive, or incompatible waste (265.176 and .177). No containers holding a waste matrix that is ignitable, reactive, or incompatible was noted during the assessments.

No issues were found.

- 1.6) Air emission standards (265.178): The 324 and 327 Buildings do not have process vents subject to Subpart AA.

No issues were found.

- 1.7) Labels (WAC 173-303-630(3)): The matrices were not labeled.

No issues were found.

- 1.8) Secondary Containment (WAC 173-303-630(7)): Secondary containment was not provided for the matrices. Matrices either do not have free liquids or are located in hot cells.

No issues were found.

2. Tank systems (40 CFR 265, Subpart J): Tank systems in the 324 Building will be dispositioned per *324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Areas Closure Plan*, DOE/RL-96-73. No tank systems containing mixed waste are present in the 327 Building. Both buildings are currently undergoing deactivation.

- 2.1) Tank integrity inspection, Independent Qualified Registered Professional Engineer assessment and secondary containment (265.191, .192, and .193): No integrity assessment has been performed. See discussion above.

No issues were found.

- 2.2) General operating requirements and inspections: (265.194 and .195): See general discussion regarding inspections. Tanks are located in vaults within the 324 Building. Lighting in the vaults is limited.

No issues were found.

- 2.3) History of leaks or spills and tank fitness for continued use (265.196): There is no planned future use for the tank systems in the 324 and 327 Buildings. Both buildings are in the process of being deactivated.

No issues were found.

3. Closure and post closure (265.197): Tank systems in the 324 Building will be dispositioned per *324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Areas Closure Plan*, DOE/RL-96-73. No tank systems containing mixed waste are present in the 327 Building. Both buildings are currently undergoing deactivation.

- 2.5) Ignitable, reactive, or incompatible waste (265.198 and .199): The 324 Building tank systems may contain residual chemicals from a defined process with known chemicals. None of the chemicals are considered reactive.

No issues were found.

- 2.6) Labels (WAC 173-303-640(5)(d)). The vessels are not labeled according to the criteria/standards. Tanks are being managed pursuant to the 324 closure plan.

No issues were found.

- 3) Containment Building (40 CFR 265 Subpart DD): Many of the matrices were evaluated against the containment building requirements because they are not containerized. The 324 Building and the 327 Building themselves, as well as the hot cells within the buildings, provide adequate protection to the matrix from the environment. The cells protect the workers from any hazards associated with the matrices.

- Finding 324-001: SMF Reactive Matrices not identified in CY2001 LDR Report
- Finding 327-001: Basement Lead not identified in CY2001 LDR Report
- Observation 324-001: Lead in SMF to be added to existing Location-Specific Data Sheet for the 324 Building under MLLW-05
- Observation 324-002: Shielded Glovebox in Room 3G to be deleted from the Potential Mixed Waste Table
- Observation 327-001: Material in SERF Cell to be added to existing Location-Specific Data Sheet for the 327 Building under MLLW-02

- 3.1) Closure and Post closure care (265.1102). Matrices will be removed from the two buildings on a schedule to meet TPA closure criteria for the 300 Area.

No issues were found.

4 FINDINGS AND OBSERVATIONS

4.1 FINDINGS

4.1.1 Finding 324-001: SMF Reactive Matrices not identified in CY2001 LDR Report

The LDR storage assessment identified reactive matrices in the SMF. The partial inventory for the Material Open Test Assembly (MOTA) samples indicates that some of the sample tubes may contain small quantities of lithium and sodium. Elemental lithium and sodium will designate as a mixed waste. The MOTA samples consist of small quantities of irradiated metallic media (reactor assemblies) in sample tubes. The MOTA samples were tested in the SMF for tensile, hardness, and fracture strength that will be identified as forecasted MW under treatability group MLLW-10. A new Location-Specific Data Sheet will be created in the CY2002 LDR Report.

4.1.2 Finding 327-001: Basement Lead not identified in CY2001 LDR Report

The LDR storage assessment identified lead not in use in the basement of the building. The lead will have a documented use during deactivation of the 327 Building. This lead will be added to Column E of the Potential Mixed Waste Table for the CY2002 LDR Report.

4.2 OBSERVATIONS

4.2.1 Observation 324-001: Lead in SMF to be added to existing Location-Specific Data Sheet for the 324 Building under MLLW-05

Partial inventories of the SMF provided by the Pacific Northwest National Laboratory (PNNL) indicate that lead or lead containing material may be present in the SMF. Because the 324 Building already reports elemental lead under a Location-Specific Data Sheet under treatability group MLLW-05, this lead will be added to the existing forecasted volume. This discovery constitutes an observation since a Location-Specific Data Sheet already exists for this type of matrix.

4.2.2 Observation 324-002: Shielded Glovebox in Room 3G to be deleted from the Potential Mixed Waste Table

The LDR storage assessment found that the shielded glovebox in Room 3G only contains floor sweepings. The glovebox does not meet LDR reporting criteria and can be deleted from the CY2002 LDR Report.

4.2.3 Observation 327-001: Material in SERF Cell to be added to existing Location-Specific Data Sheet for the 327 Building under MLLW-02

During the LDR storage assessment of the 327 Building, a tube of Permatex™ sealant was found in the SERF cell. Subsequent designation determined this material will need to be managed as a mixed waste. The matrix will be added to the existing Location-Specific Data Sheet for the 327 Building under treatability group MLLW-02. Because the volume of the matrix is so small, no change in volume is expected to be seen in the CY2002 LDR Report.

5 PERSONNEL CONTACTED

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6 DATA GAP PLAN

This section fulfills the requirements of a Data Gap Plan, pursuant to the TPA under Milestone M-26-01¹. Accordingly, a data gap plan must contain the following:

- What you know and what you don't know
- What you need to know
- Why the level of unknowns is acceptable or not acceptable from a safety basis for the interim until action is planned or that more information is needed to make this determination.

The above Data Gap Plan elements need to be addressed for the MW and the PMW matrices identified by the LDR storage assessment². The 324 Building and the 327 Building LDR storage assessment identified the following MW and PMW matrices:

| Mixed Waste/Forecasted Mixed Waste Matrices | Potential Mixed Waste Matrices |
|--|--------------------------------|
| 324 Building REC Waste | 324 Shielded Glovebox |
| 324 lead | 327 Elemental Lead |
| 327 SERF Sealant | SMF Reactive Matrices |
| Existing 324 and 327 forecasted waste in data sheets | |

What you know and what you don't know

The information presented in this section was obtained from the LDR storage assessment. No additional project evaluation information is presented.

324 Building REC Waste

The 324 Building REC waste is currently being dispositioned per TPA Milestone M-94-01, as outlined in *324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Areas Closure Plan*, DOE/RL-96-73. Per the closure plan, high risk materials and dispersible mixed waste will be removed from these areas prior to demolition of the building. Extensive sampling and analysis was performed on the dispersible material prior to commencement of cleanout activities. Currently, the majority of the dispersible material has

¹ Letter, Alan E. Hopko, RL, to E. K. Thompson, FH, "Contract No. DE-AC06-96RL13200 – Annual Land Disposal Restriction (LDR) Report Requirements and Notification to Conduct Assessments," 02-WMD-213, #0202987, dated June 25, 2002.

² Letter, Sally A. Sieracki, RL, to E. K. Thompson, FH, "Contract No. DE-AC06-96RL13200 – Resource Conservation and Recovery Act (RCRA) Assessment – A&E-SEC-02-009," 02-PMO-0003, #0203878, dated August 19, 2002.

been removed from the 324 REC significantly reducing safety issues associated with these materials.

324 Lead

A partial inventory provided by PNNL for the SMF indicates that lead or lead containing material may be present in the SMF. The exact amount of lead or lead containing material in the SMF is currently unknown due to the existence of only a partial inventory of the contents of the SMF. Efforts to cleanout the SMF commenced in FY2003. During cleanout of the SMF, any lead or lead containing material discovered will be managed as mixed waste. The lead and/or lead containing materials are located within a heavily shielded series of cells and does not present a safety concern. An entry will be made to an existing data sheet for the SMF lead.

327 SERF Sealant

The tube of sealant has been identified, a Material Safety Data Sheet has been obtained, and a preliminary designation has been performed. The waste designation indicates that the material in the SERF Cell will be managed as a mixed waste during deactivation and cleanout of the SERF Cell. The sealant is contained within a heavily shielded cell and does not present a safety concern. An entry will be made to an existing data sheet for the SERF Cell sealant.

Existing 324 and 327 forecasted waste in data sheets

The existing data sheets for 324 and 327 are appropriate and reflect the mixed waste/forecasted mixed waste.

324 Shielded Glovebox

The LDR storage assessment found that the shielded glovebox in Room 3G of the 324 Building only contains floor sweepings.

327 Elemental Lead

The LDR storage assessment identified lead in the basement of the building that is not currently in use as shielding. The lead will have a documented use during deactivation of the 327 Building.

324 SMF Reative Matrices

The LDR storage assessment identified reactive matrices in the SMF. A partial inventory provided by PNNL for the Material Open Test Assembly (MOTA) samples indicates that some of the sample tubes may contain small quantities of lithium and sodium. Elemental lithium and sodium will designate as a mixed waste. Efforts to further inventory, and subsequently clean out and manage the contents of the SMF commenced in FY2003. The sample tubes are contained within a storage rack which is covered by a 5,000 pound shielded cover block, which is in turn contained within a heavily shielded hot cell.

What you need to know

The information for this item contains the information needed to approach the Tri-Party Agreement lead regulatory agency project manager (Ecology in this case) in order to have discussions on the MW and PMW matrices.

324 Building REC Waste

No additional information is needed. The mixed waste in the 324 REC has been characterized and is currently being managed under TPA Milestones M-94-01, M-92-16, and M-89-00.

324 Lead

No additional information is needed. The SMF lead will be managed as a mixed waste and added to the Location-Specific Data Sheet under treatability group MLLW-05.

327 SERF Sealant

No additional information is needed. The sealant material will be managed as a mixed waste and added to the Location-Specific Data Sheet under treatability group MLLW-02.

Existing 324 and 327 forecasted waste in data sheets

No additional information is needed. The mixed waste/forecasted mixed waste under existing data sheets can be managed with existing information.

324 Shielded Glovebox

Not applicable. The shielded glovebox contains only floor sweepings. The glovebox does not meet the LDR reporting criteria and can be removed from the CY2002 LDR Report Potential Mixed Waste Table.

327 Elemental Lead

No additional information is needed. This lead will be used for shielding during facility deactivation activities. This lead will be added to Column E of the Potential Mixed Waste Table for the CY2002 LDR Report.

324 SMF Reative Matrices

As part of efforts to clean out the SMF, repairs to the SMF crane must be completed to allow for removal of the shielded cover block from the MOTA sample rack. A more complete inventory can then be developed. The MOTA samples containing lithium and sodium will be identified as forecasted MW under treatability group MLLW-10. A new Location-Specific Data Sheet will be created in the CY2002 LDR Report.

Why the level of unknowns is acceptable or not acceptable from a safety basis for the interim until action is planned or that more information is needed to make this determination.

The level of unknowns regarding the PMW matrices will not result in any concerns regarding the safe management of the matrices. Sufficient information exists so that there are no likely concerns about ignitable, reactive, or incompatible matrix properties. The 324 hot cell provides adequate protection for the SMF reactive matrices. The project's scheduled activities will be discussed with the TPA lead regulatory agency project manager after the Data Gap Plan is entered into the TPA Administrative Record.

Appendix A – 324 Building Assessment Checklist

| WAC 173-303 or 40 CFR citation | Requirement | Applies to location for evaluation (Y/N)? | Meets requirement (Y/N)? | Comments |
|--------------------------------------|--|--|--------------------------------|---|
| | Matrices Investigated: <ul style="list-style-type: none"> • 324 Building REC Waste • Lead in SMF • Reactive Metals in SMF | | | |
| General Requirements | | | | |
| WAC: -140 | LDR refers to 40 CFR 268 | | | |
| 268.7(a)(1) | Has a waste determination been performed to assign waste codes? | Y | N | For the 324 Building REC Waste, the closure plan identifies the waste codes. For the other two matrices, information to determine what waste codes would apply to the matrices has not been obtained. Until information is obtained to determine waste codes, an evaluation to determine treatment standard applicability cannot be made. Information will be obtained during the characterization, inventory, and subsequent clean out of the SMF, scheduled for commencement in FY2003. |
| 268.7(a)(1) | Can a treatment standard be assigned to the matrix? | Y | N | For the 324 Building REC waste, yes. For the other two matrices, the waste determination must be completed first. |
| 268.7(a)(1) | Is the treatment standard met for the matrix? | Y | N | For the 324 Building REC waste, no. For the other two matrices, the waste determination must be completed first. |
| 268.7(a)(2), (3), and (4) | Has the required information been submitted to the receiving storage or treatment unit/facility? | Y/N | Y | For the 324 Building REC waste, yes, as appropriate to facilitate shipment. For the other two matrices, question does not apply. |
| 268.7(a)(5) | Has treatment-by-generator requirements been used? Is a waste analysis plan necessary? | N | | |
| 268.7(a)(6) | Has knowledge for contaminated soil been retained in records? | N | | |
| 268.7(a)(7) | Is the matrix excluded from the definition of hazardous waste or solid waste? Is the explanation in the records? | N | | |
| 268.7(a)(8) | Are LDR records maintained on | Y | Y/N | Yes for the 324 Building REC |

| WAC 173-303 or 40 CFR, citation | Requirement | Applies to location for evaluation (Y/N)? | Meets requirement (Y/N)? | Comments |
|---------------------------------|---|---|--------------------------|--|
| | site for 3 years. | | | Waste. For the other two matrices, records have not been generated. |
| 268.7(a)(9) | Will a labpack be managed using the alternative treatment standards? | N | | |
| WAC: -280 | General requirements for dangerous waste management facilities. Is there a Part A? Is the location included? | Y | Y | No eminent hazards are believed to exist. No Part A exists for the 324 Building. For the 324 Building REC Waste, storage is pursuant to the TPA. |
| WAC: -281 | Notice of Intent | N | | |
| WAC: -282 | Siting Criteria | N | | |
| WAC: -283 | Performance standards. Are they met? | Y | Y | The Hanford Site meets the performance standards. |
| WAC: -300 | General Waste Analysis. Is there a detailed description of waste that has been received? Is there a waste analysis plan per (5) and (6)? Get copy. Does the plan meet the criteria? | Y | N | Waste analysis information is contained in the closure plan for the 324 Building REC Waste. |
| WAC: -310 | Security. Are there signs posted, or 24-hour surveillance, or barrier, per (2)? | Y | Y | |
| WAC: -320 | General Inspections: Is there a written schedule per (2)? Get copy. Is there an inspection log? Get copy from last month. Have any problems been remedied? | Y | Y | |
| WAC: -330 | Personnel training. Is there a training program? Is there a written training plan per (2)? | Y | Y | |
| WAC: -335 | Construction Quality Assurance | N | | |
| WAC: -340 | Preparedness & Prevention. Is required equipment identified? If not, has demonstration been performed per (1)? Are there communications or alarms per (2)? Is aisle space maintained per (3)? | Y | Y | |
| WAC: -350 | Contingency Plan and emergency procedures. Is there a contingency plan? Get copy. Does it contain criteria in (3)? Is a copy maintained per (4)? Is it up to date per (5)? | Y | Y | |
| WAC: -355 | SARA Title III | Y | Y | This is a site-wide provision. |
| WAC: -360 | Emergencies. Is there an emergency coordinator per (1) (BED/BW)? Has there ever been an emergency? If so, were | Y | Y | The 324 Building maintains an emergency coordinator. An emergency is not known to have occurred. |

| WAC 173-303 or 40 CFR citation | Requirement | Applies to location for evaluation (Y/N)? | Meets requirement (Y/N)? | Comments |
|--------------------------------|---|---|--------------------------|---|
| | procedures implemented per (2)? | | | |
| WAC: -370 | Manifest system. Has waste received been manifested or transferred with on-site shipping records? | N | | |
| WAC: -380 | Facility recordkeeping. Is there an operating record? If so, does it contain the information per (1)? Are records maintained per (2)? | Y | Y | Records are maintained in the unit-specific operating record and regulatory file. |
| WAC: -390 | Facility Reporting. Has any unmanifested waste been reported per (1)? Has information been included in annual reports per (2)? Has any additional information been reported per (3)? Are copies maintained per (4)? | N | | |
| WAC: -395 | Other general requirements. Does ignitable, reactive, or incompatible matrices exist at the location? If so, are precautions in (1) taken? Are tanks and containers labeled per (6)? | Y | N | Small quantities of lithium and sodium are present in the SMF. |
| WAC: -610 | The TPA Action plan requires closure pursuant to WAC 173-303-610. 40 CFR Subpart G is not used for closure of TSD units at Hanford. | Y | Y | |
| WAC: -610(2) | Has closure standard to remove or decontaminate been met? | Y | Y | Closure activities are currently underway, per the 324 Closure Plan. |
| WAC: -610(3) | Is there a written closure plan? Does the plan meet the criteria? Is the plan current? | Y | Y | |
| WAC: -610(3)(c) | Has there been notification of partial closure? | N | | |
| WAC: -610(4) | Are timeframes met for closure? Has a demonstration for delay of closure been submitted? | N | | Closure schedule is governed by the TPA. |
| WAC: -610(5) | Has waste been removed, treated, or disposed per approved closure plan per -610(5)? | Y | Y | |
| WAC: -610(6) | Has certification of closure been submitted to Ecology? | N | | |
| WAC: -646 | Corrective Action. Has there been a release? If so, were any corrective actions taken? Get any documentation. | N | | |
| 265 Subpart AA | Air emissions for process vents. Are there process vents per .1030? If yes, is unit subject to requirements? | N | | |
| 265 Subpart | Air emissions standards and | N | | |

| WAC 173-303 or 40 CFR citation | Requirement | Applies to location for evaluation (Y/N)? | Meets requirement (Y/N)? | Comments |
|--------------------------------|--|---|--------------------------|--|
| BB | equipment leaks | | | |
| 265 Subpart CC | Air emissions for tanks, containers, and surface impoundments | N | | Mixed waste is exempt from Subpart CC requirements. |
| Specific Requirements | | | | |
| WAC: - 400(3)(a) | The types of waste management requirements for 40 CFR Subparts for this location include: -Containers (Subpart I) -Tank System (Subpart J) -Containment Building (Subpart DD) | | | |
| 265 Subpart I | Use and management of containers | | | |
| 265.171 | Is container in good condition? | Y | Y | |
| 265.172 | Is waste compatible with the container? | Y | Y | Incompatible matrices in containers are not present. |
| 265.173 | Management of containers. Are containers closed? Are the containers managed to prevent rupture? | Y | Y | |
| 265.174 | Inspections. Are weekly inspections performed? | Y | Y | |
| 265.176 | Ignitable and reactive waste. Are ignitable and reactive waste 50 feet from Hanford Site property line | Y | Y | |
| 265.177 | Incompatible waste. Are incompatible wastes separated or otherwise protected? | Y | N | Incompatible matrices in containers are not present. |
| 265.178 | Is waste managed in compliance with the air emission standards of Subpart AA, BB, and CC? | Y | Y | The 324 Building does not have process vents subject to Subpart AA. There is no organic waste expected subject to Subpart BB. Mixed waste is excluded from Subpart CC. |
| WAC: - 630(3) | Are containers labeled per - 630(3)? | Y | Y | |
| WAC: - 630(7) | Are containers provided with secondary containment? | Y | N | Matrices requiring secondary containment are not present. |
| 265 Subpart J | Tank Systems | | | |
| 265.191 | Has an integrity assessment been completed per .191? If so, get copy. | N | | |
| 265.191 | Is assessment certified by IQRPE per 270.11(d)? | N | | |
| 265.192 | Are new system components designed and installed per .192? | N | | |

| WAC 173-303 or 40 CFR citation | Requirement | Applies to location for evaluation (Y/N)? | Meets requirement (Y/N)? | Comments |
|--------------------------------------|--|--|--------------------------------|---|
| | If not, what's missing? | | | |
| 265.193 | Is there secondary containment for the tank(s) and ancillary equipment? If so, does it meet .193 requirement? If not, has a request for a variance been submitted .193(h)? | Y | N | Concrete vault. Does not meet RCRA. The status of the vaults was addressed in the closure plan. |
| 265.194 | Are general operating requirements met per .194? List spill prevention controls and overfill prevention controls. | N | | |
| 265.195 | Are inspections performed per .195? Get copies of last month of inspections. | Y | N | See general requirement for inspections |
| 265.196 | Has there been a leak or a spill? What? When? | Y | | Unknown, however activities under the 324 closure plan will address this. |
| 265.196 | Is the tank unfit for use? If so, has criteria of .196 been met? | Y | | Unknown. |
| 265.197 | Has waste been removed or decontaminated per .197? Is there a closure plan? | Y | N | See general discussions regarding closure. |
| 265.198 & .199 | Is there a clear understanding of what was placed in the tank system? If ignitable or reactive, did it meet .198 requirements? If incompatible, did it meet .199 requirements? | Y | Y | Matrices are not believed to be ignitable, reactive, or incompatible. |
| 265.200 | Waste analysis and trial tests. | N | | |
| WAC: - 640(d) | Are tanks labeled per --640(5)(d)? | N | | |
| 265 Subpart DD | Containment Buildings | | | |
| 265.1101 | Design and operating. Does the containment building comply with the design standards of .1101? | Y | N | The SMF provides adequate protection from any hazards. |
| 265.1102 | Closure and post-closure. Has the matrices been removed or decontaminated? | Y | N | SMF cleanout will remove or decontaminate the lead and reactive matrices. |

Appendix B – 327 Building Assessment Checklist

| WAC 173-303 or 40 CFR citation | Requirement | Applies to location for evaluation (Y/N)? | Meets requirement (Y/N)? | Comments |
|--------------------------------|---|---|--------------------------|--|
| | Matrices Investigated: <ul style="list-style-type: none"> SERF sealant Basement lead | | | |
| General Requirements | | | | |
| WAC: -140 | LDR refers to 40 CFR 268 | | | |
| 268.7(a)(1) | Has a waste determination been performed to assign waste codes? | Y | Y | |
| 268.7(a)(1) | Can a treatment standard be assigned to the matrix? | Y | Y | SERF sealant will be reported under MLLW-02. |
| 268.7(a)(1) | Is the treatment standard met for the matrix? | Y | N | |
| 268.7(a)(2), (3), and (4) | Has the required information been submitted to the receiving storage or treatment unit/facility? | N | | |
| 268.7(a)(5) | Has treatment-by-generator requirements been used? Is a waste analysis plan necessary? | N | | |
| 268.7(a)(6) | Has knowledge for contaminated soil been retained in records? | N | | |
| 268.7(a)(7) | Is the matrix excluded from the definition of hazardous waste or solid waste? Is the explanation in the records? | N | | |
| 268.7(a)(8) | Are LDR records maintained on site for 3 years. | N | | |
| 268.7(a)(9) | Will a labpack be managed using the alternative treatment standards? | N | | |
| WAC: -280 | General requirements for dangerous waste management facilities. Is there a Part A? Is the location included? | Y | Y | No eminent hazards are believed to exist. No Part A exists for the 327 Building. |
| WAC: -281 | Notice of Intent | N | | |
| WAC: -282 | Siting Criteria | N | | |
| WAC: -283 | Performance standards. Are they met? | Y | Y | The Hanford Site meets the performance standards. |
| WAC: -300 | General Waste Analysis. Is there a detailed description of waste that has been received? Is there a waste analysis plan per (5) and (6)? Get copy. Does the plan meet the criteria? | Y | N | No additional testing is anticipated to manage these matrices. |
| WAC: -310 | Security. Are there signs posted, or 24-hour surveillance, or barrier, per (2)? | Y | Y | |
| WAC: -320 | General Inspections: Is there a written schedule per (2)? Get | Y | Y | |

| WAC 173-303 or 40 CFR citation | Requirement | Applies to location for evaluation (Y/N)? | Meets requirement (Y/N)? | Comments |
|--------------------------------|---|---|--------------------------|--|
| | copy. Is there an inspection log? Get copy from last month. Have any problems been remedied? | | | |
| WAC: -330 | Personnel training. Is there a training program? Is there a written training plan per (2)? | Y | Y | |
| WAC: -335 | Construction Quality Assurance | N | | |
| WAC: -340 | Preparedness & Prevention. Is required equipment identified? If not, has demonstration been performed per (1)? Are there communications or alarms per (2)? Is aisle space maintained per (3)? | Y | Y | |
| WAC: -350 | Contingency Plan and emergency procedures. Is there a contingency plan? Get copy. Does it contain criteria in (3)? Is a copy maintained per (4)? Is it up to date per (5)? | Y | Y | |
| WAC: -355 | SARA Title III | Y | Y | This is a site-wide provision. |
| WAC: -360 | Emergencies. Is there an emergency coordinator per (1) (BED/BW)? Has there ever been an emergency? If so, were procedures implemented per (2)? | Y | Y | The 327 Building maintains an emergency coordinator. An emergency is not known to have occurred. |
| WAC: -370 | Manifest system. Has waste received been manifested or transferred with on-site shipping records? | N | | |
| WAC: -380 | Facility recordkeeping. Is there an operating record? If so, does it contain the information per (1)? Are records maintained per (2)? | Y | Y | Records are maintained in the unit-specific regulatory file. |
| WAC: -390 | Facility Reporting. Has any unmanifested waste been reported per (1)? Has information been included in annual reports per (2)? Has any additional information been reported per (3)? Are copies maintained per (4)? | N | | |
| WAC: -395 | Other general requirements. Does ignitable, reactive, or incompatible matrices exist at the location? If so, are precautions in (1) taken? Are tanks and containers labeled per (6)? | N | | No waste matrices of this nature are present. |
| WAC: -610 | The TPA Action plan requires closure pursuant to WAC 173-303-610. 40 CFR Subpart G is not used for closure of TSD units at Hanford. | | | |
| WAC: - | Has closure standard to remove or | Y | N | 327 Building cleanout |

| WAC 173-303 or 40 CFR citation | Requirement | Applies to location for evaluation (Y/N)? | Meets requirement (Y/N)? | Comments |
|--------------------------------------|--|--|--------------------------------|---|
| 610(2) | decontaminate been met? | | | activities will meet the closure standard for these matrices. |
| WAC: - 610(3) | Is there a written closure plan? Does the plan meet the criteria? Is the plan current? | Y | N | 327 Building cleanout activities will meet the closure standard for these matrices. |
| WAC: - 610(3)(c) | Has there been notification of partial closure? | N | | |
| WAC: - 610(4) | Are timeframes met for closure? Has a demonstration for delay of closure been submitted? | N | | |
| WAC: - 610(5) | Has waste been removed, treated, or disposed per approved closure plan per -610(5)? | N | | |
| WAC: - 610(6) | Has certification of closure been submitted to Ecology? | N | | |
| WAC: -646 | Corrective Action. Has there been a release? If so, were any corrective actions taken? Get any documentation. | N | | |
| 265 Subpart AA | Air emissions for process vents. Are there process vents per .1030? If yes, is unit subject to requirements? | N | | |
| 265 Subpart BB | Air emissions standards and equipment leaks | N | | |
| 265 Subpart CC | Air emissions for tanks, containers, and surface impoundments | N | | Mixed waste is exempt from Subpart CC requirements. |
| Specific Requirements | | | | |
| WAC: - 400(3)(a) | The types of waste management requirements for 40 CFR Subparts for this location include: -Containers (Subpart I) -Tank System (Subpart J) -Containment Building (Subpart DD) | | | |
| 265 Subpart I | Use and management of containers | | | |
| 265.171 | Is container in good condition? | N | | |
| 265.172 | Is waste compatible with the container? | N | | |
| 265.173 | Management of containers. Are containers closed? Are the containers managed to prevent rupture? | N | | |
| 265.174 | Inspections. Are weekly inspections performed? | N | | |
| 265.176 | Ignitable and reactive waste. Are ignitable and reactive waste 50 feet from Hanford Site property | N | | |

| WAC 173-303 or 40 CFR citation | Requirement | Applies to location for evaluation (Y/N)? | Meets requirement (Y/N)? | Comments |
|--------------------------------------|--|--|--------------------------------|--------------------------|
| | line | | | |
| 265.177 | Incompatible waste. Are incompatible wastes separated or otherwise protected? | N | | |
| 265.178 | Is waste managed in compliance with the air emission standards of Subpart AA, BB, and CC? | N | | |
| WAC: - 630(3) | Are containers labeled per - 630(3)? | N | | |
| WAC: - 630(7) | Are containers provided with secondary containment? | N | | |
| 265 Subpart J | Tank Systems | | | |
| 265.191 | Has an integrity assessment been completed per .191? If so, get copy. | N | | |
| 265.191 | Is assessment certified by IQRPE per 270.11(d)? | N | | |
| 265.192 | Are new system components designed and installed per .192? If not, what's missing? | N | | |
| 265.193 | Is there secondary containment for the tank(s) and ancillary equipment? If so, does it meet .193 requirement? If not, has a request for a variance been submitted .193(h)? | N | | |
| 265.194 | Are general operating requirements met per .194? List spill prevention controls and overfill prevention controls. | N | | |
| 265.195 | Are inspections performed per .195? Get copies of last month of inspections. | N | | |
| 265.196 | Has there been a leak or a spill? What? When? | N | | |
| 265.196 | Is the tank unfit for use? If so, has criteria of .196 been met? | N | | |
| 265.197 | Has waste been removed or decontaminated per .197? Is there a closure plan? | N | | |
| 265.198 & .199 | Is there a clear understanding of what was placed in the tank system? If ignitable or reactive, did it meet .198 requirements? If incompatible, did it meet .199 requirements? | N | | |
| 265.200 | Waste analysis and trial tests. | N | | |
| WAC: - 640(d) | Are tanks labeled per --640(5)(d)? | N | | |
| 265 Subpart DD | Containment Buildings | | | |
| 265.1101 | Design and operating. Does the | Y | N | The SERF sealant is in a |

| WAC 173-303 or 40 CFR citation | Requirement | Applies to location for evaluation (Y/N)? | Meets requirement (Y/N)? | Comments |
|--------------------------------------|--|--|--------------------------------|---|
| | containment building comply with the design standards of .1101? | | | hotcell and the lead is in the basement of the building. |
| 265.1102 | Closure and post-closure. Has the matrices been removed or decontaminated? | Y | N | See general discussions regarding closure. |

Appendix C – Assessment Scope Planning Notes

| Area (324 Bldg.) | Potential Mixed Waste Present? | Waste Matrix Description | Verification Documentation/Process Knowledge | Comments |
|---|--------------------------------------|-----------------------------|--|--|
| A-Cell, B-Cell, C-Cell, D-Cell, Hot Cell Airlock, High-Level Vault, Low-Level Vault | NA | NA | 324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Areas Closure Plan, DOE/RL-96-73, Revision 1 | These areas are covered under the closure plan and the 324 Treatability Group in the LDR Report. These areas have been identified as non- permitted mixed waste units to be closed per the TPA. |
| 324 RLWS piping system | NA | NA | Personnel interviews. | The piping is part of a 90-day tank system and is therefore not within the scope of the assessment. |
| 324 Process Sewer System | NA | NA | Personnel interviews. | This area is below ground, and therefore not within the scope of this assessment because excavation is not expected within 5 years. |
| 324 Retention Process Sewer System | NA | NA | Personnel interviews. | This area is below ground, and therefore not within the scope of this assessment because excavation is not expected within 5 years.. |
| Engineering Development Laboratory 102 | NA | NA | Personnel interviews. | This is a non- radiological area and is therefore not within the scope of this assessment. |
| High Bay | NA | NA | Personnel interviews. | This is a non- radiological area and is therefore not within the scope of this assessment. |
| Room 3B, Room 3F, and Storage Vault | NA | NA | Personnel interviews. | This is a non- radiological area and is therefore not within the scope of this assessment. |

Appendix C – Assessment Scope Planning Notes

| Area (324 Bldg.) | Potential Mixed Waste Present? | Waste Matrix Description | Verification Documentation/Process Knowledge | Comments |
|---|--|---|--|--|
| Waste Water Diverter System, Catch Tank, and Ion Exchange Tank | NA | NA | Personnel interviews. | This is a non-radiological area and is therefore not within the scope of this assessment. |
| Nitric Acid Bulk Chemical Tank | NA | NA | Personnel interviews. | This is a non-radiological area and is therefore not within the scope of this assessment. |
| 324 Shielded Material Facility (SMF) South Cell | No, but forecasted mixed waste under MLLW-05 was discovered | Lead items; Cell also contains large quantity of non-mixed waste – tools, equipment, etc. | Visual inspection; interviews; reviewed facility inventory provided by PNNL. Several lead items are listed that do not appear to be utilized as shielding. | Lead appears to be present in the SMF inventory that is not being used for shielding. Cleanout activities in the SMF are expected to commence in FY2003. |
| 324 Shielded Material Facility (SMF) East Cell, Room 139C, and Manipulator Shop | No, but forecasted mixed waste under MLLW-10 was discovered. | Li, Na Samples; Cell also contains large quantity of non-mixed waste – tools, equipment, etc. | Visual inspection; interviews; reviewed MOTA sample inventory provided by PNNL. Several samples are listed that appear to contain lithium and sodium. | The MOTA sample inventory is not complete. Efforts are underway to provide more characterization data for the samples. Cleanout activities in the SMF are expected to commence in FY2003. |
| Room 146; Fume Hood and DC Arc Melter | No | Vitrified glass in melter. | Personnel interviews; visual inspection; review of characterization report (BWHC-9850109). | Characterization report was prepared by PNNL and BWHC during period when facility ownership transferred. TCLP of melter contents indicate non-mixed waste. |
| Shielded Glovebox, Room 3G | No | Floor sweepings; glovebox is otherwise empty. | Visual inspection; personnel interviews. | This area is currently listed in the PMW table in the annual LDR report. This entry should be removed from the PMW table, as the glovebox only contains floor sweepings. In addition, cleanout of this glovebox is a Silver List item and is tied to TPA Milestone M-094-01. |

Appendix C – Assessment Scope Planning Notes

| Area (327 Bldg.) | Potential Mixed Waste Present? | Waste Matrix Description | Verification Documentation/Process Knowledge | Comments |
|------------------------|--------------------------------------|---|---|---|
| A-Cell | No | Satellite Accumulation Area for batteries and light bulbs containing lead. Cell also contains empty cans, used equipment, etc. | Visual inspection; SAA are not subject to the LDR storage assessment. | Data sheet exists for forecasted mixed waste matrix in LDR report. |
| B-Cell | No | Floor sweepings present; cell is otherwise empty. | Visual inspection; personnel interviews. | Efforts are underway to sample and characterize paint chips (floor sweepings) in cell. |
| 327 RLWS piping system | NA | NA | Personnel interviews. | The piping is part of a 90-day tank system and is therefore not within the scope of the assessment. |
| C-Cell | No | Cell contains a few non-mixed waste items – equipment tools; lead bricks currently being used as rad shielding. | Visual inspection; Personnel interviews. | None. |
| D-Cell | No | Cell contains large quantity of non-mixed waste items – equipment, tools, lidded cans, etc. | Visual inspection; Personnel interviews; Lidded can inventory review. | Reviewed several lidded can inventory sheets – no mixed waste constituents listed. Most contain miscellaneous high dose rate metal (SS, etc.) |
| E-Cell | No | Cell contains non-mixed waste items, empty cans, equipment, etc. Under cell are empty isopropyl alcohol tanks; Lead blankets being used for rad shielding are also present. | Visual inspection; Personnel interviews. | None. |
| F-Cell | No | Cell contains equipment, tools, etc. – non-mixed waste items. | Visual inspection; Personnel interviews. | None. |

Appendix C – Assessment Scope Planning Notes

| Area (327 Bldg.) | Potential Mixed Waste Present? | Waste Matrix Description | Verification Documentation/Process Knowledge | Comments |
|--|---|--|--|---|
| G-Cell | No | Cell is empty, except lead bricks being used for rad shielding. | Visual inspection; personnel interviews. | None. |
| H-Cell | No | Cell contains a few non-mixed waste manipulator parts; Lead bricks being used as rad shielding. | Visual inspection; Personnel interviews. | None. |
| I-Cell | No | Cell is empty, except lead bricks being used for rad shielding. | Visual inspection; Personnel interviews. | None. |
| Special Environmental Radiometallurgy Facility (SERF) Cell | No, however the sealant will be included in the location specific data sheet forecast volume for 327 under MLLW-02. | Cell contains a large quantity of non-mixed waste items, empty cans, equipment, etc. Two tubes of sealant were also present. | Visual inspection; Personnel interviews. | One type of Sealant will be managed as mixed waste; one type was non-mixed, the other a state-only toxic. |
| Liquid Waste System | No | No waste remaining. System has been drained, flushed, sampled, and isolated. Lead is present on pipes as rad shielding. | Visual inspection; Personnel interviews; Review of sample and analysis data for samples. | The Liquid Waste System has been sampled and shown to be non-mixed. The lead is integral to the building. |
| Dry Storage Carousel | No | Storage carousel contains fuel and cladding specimens. No mixed constituents. | Personnel interviews; Review of inventory of remaining fuel pieces in the carousel. | None. |
| Basement Storage Area | Yes. | No waste noted in this area. Some lead bricks in storage for future rad shielding. | Visual inspection; Personnel interviews. | The lead will be added to the potential mixed waste table because it is not being used. |

Appendix C – Assessment Scope Planning Notes

| Area (327 Bldg.) | Potential Mixed Waste Present? | Waste Matrix Description | Verification Documentation/Process Knowledge | Comments |
|--|--------------------------------------|--|---|---|
| Isopropyl Alcohol Tanks | No | Tanks have been removed from under C-Cell. Remaining tanks under E-Cell are empty. | Visual inspection; Personnel interviews. | Tanks are open and empty. |
| Room #16, Burst Test Basin | No | Test Basin has been drained, the water was sampled, and covered and capped. | Visual inspection; Personnel interviews; Sample and Analysis data review. | Sample and analysis data and subsequent designation indicate water was non-mixed. |
| Wet Storage/Transfer Basin | No | Basin contains activated stainless-steel from FFTF; Empty fuel tubing; Ion exchange columns. | Visual inspection; Personnel interviews; Review of sample and analysis data for ion exchange media. | None. |
| Room #20, Decontamination Room with Ultrasonic Sink and Fume Hood | No | Empty sink and other equipment; Fume hood contains bagged non-mixed waste items | Visual inspection; Personnel interviews. | None. |
| Low Level Waste Compactor in Truck Lock | No | No mixed waste noted in this area. | Visual inspection; Personnel interviews. | Operating procedures and operator visual verification ensure no mixed waste is introduced into the low level waste compactor. |
| Ventilation System in Basement | NA | NA | Personnel interviews. | The ventilation system is integral to the building and is therefore beyond the scope of this assessment. |